

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814



February 9, 1995

ALL-COUNTY INFORMATION NOTICE NO. I-08-95

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY FISCAL OFFICERSREASON FOR THIS TRANSMITTAL

- ☐ State Law Change
- ☐ Federal Law or Regulation Change
- ☐ Court Order or Settlement Agreement
- ☐ Clarification Requested by One or More Counties
- ☒ Initiated by CDSS

SUBJECT: QUESTIONS AND ANSWERS CONCERNING THE FEDERAL OMNIBUS BUDGET RECONCILIATION ACT OF 1993 (PUBLIC LAW 103-66) FAMILY PRESERVATION AND SUPPORT PROGRAM (FPSP)

REFERENCE: LETTER TO COUNTY BOARD OF SUPERVISORS DATED JULY 1, 1994 TRANSMITTING THE FPSP LOCAL PLANNING GUIDELINES.
COUNTY FISCAL LETTERS (CFL) No. 94/95-04, No. 94/95-21 and No. 94/95-27

On July 1, 1994, the California Department of Social Services (CDSS) issued preliminary planning guidelines to all County Board of Supervisors, County Welfare Department Directors, and County Administrative Officers. The guidelines were issued to provide counties with information on the new federal FPSP so that they could begin their local planning processes.

Subsequent to the issuance of the local planning guidelines, the Children's Services Branch of the CDSS received questions from counties about the new program. The purpose of this letter is to transmit the questions received and their answers. The questions and answers have been categorized as follows: Planning, Fiscal, and Timelines.

PLANNING

1. Q. The planning body is a large group, can a smaller "administrative" group (10-15 people) make the final decisions or recommendations to the Board?
 - A. The preliminary planning guidelines issued by the CDSS require the "active" involvement of the planning body. This involvement includes completing the county's needs assessment process and developing the county's five-year plan. A county may choose to have representatives from the planning body make the final recommendations to the Board as long as those recommendations support the county's needs assessment.

2. Q. Is Mental Health included in the planning body?
- A. Yes. As specified in the preliminary planning guidelines, a representative from County Mental Health must be included in the planning body.
3. Q. Can a county contract with an agency, i.e., their child abuse prevention council, to complete an evaluation of their FPSP?
- A. Yes. Counties may use FPSP funds to conduct an evaluation of their local county FPSP and contracting for that evaluation is permissible.
4. Q. Are Indian representatives in California receiving a separate allocation from the federal FPSP grants available to states?
- A. No. Indian Tribes eligible for the separate federal allocation, as described in federal ACYF-PI-94-04, do not include Indian Tribes in California.
5. Q. In addition to allocating FPSP funds to the 58 counties, will the CDSS provide a separate allocation to California Indian Tribes?
- A. At this time, the CDSS will not be providing a separate allocation to California Indian Tribes. However, when developing their five-year plans, counties are required to complete a needs assessment process which includes collecting data on the populations to be served within their communities. This needs assessment process should include information on the needs of Indian children and families who reside within the community. Indian Tribes have completed needs assessments which may be requested from the local inter-tribal council.
6. Q. If counties find that they do not need to use all of their 1994 FPSP funds for planning and wish to direct funds for services at a later point, can the one-year plan be amended?
- A. Yes. Counties can amend their one-year plans to include services. The amended plan must include the information required in the services component on pages 5 and 6 of the preliminary FPSP planning guidelines.
7. Q. Do counties have to "start over" to develop their FPSP plan if they already have collaborative efforts in place?
- A. No. Counties are encouraged to build upon current collaborative processes and use existing information on local needs and available resources.

FISCAL

1. Q. Can the planning allocation be used for the following costs:

- o Staff salary and benefits;
- o Consultant contracts;
- o Printing and distribution;
- o Planning meeting expenses;
- o Travel expenses, in-county and out-of-county;
- o Computer equipment and software; and
- o The purchase of demographic information reports from outside databases?

A. Yes. All of the above types of activities would be allowable for reimbursement. The purchase of computer equipment may require approval from the CDSS. County staff should request assistance from their county fiscal staff with regard to the requirements for specific electronic data processing equipment purchases.

2. Q. How are planning funds to be claimed? Is an advance possible?

A. Please refer to County Fiscal Letters (CFL) No. 94/95-04 dated July 29, 1994, No. 94/95-21, dated September 23, 1994 and No. 94/95-27 dated October 12, 1994, for specific claiming instructions for the FPSP. The following program codes have been established to capture the costs for FPSP:

- o 514 - FPSP Planning
- o 515 - FPSP Family Preservation Services
- o 516 - FPSP Family Support Services
- o 517 - FPSP Training

We are still in the process of researching with CDSS fiscal staff the possibility of an advance and will advise counties of the decision via another letter soon.

3. Q. Are federal fiscal year (FFY) 1994 funds available through the end of the state fiscal year?

A. Yes. As stated in CFL No. 94/95-04, counties will have until September 30, 1995 to expend (i.e., obligate and liquidate) FFY 1994 funds.

4. Q. Since FFY 1995, ending September 30, 1996, overlaps state fiscal year 1994, ending June 30, 1995, are counties required to prorate FFY 1995 funds for use during state fiscal year 1994?

A. No. Counties are not required to prorate funds between federal and state fiscal years. Counties should refer to CFL No. 94/95-04 for fiscal and claiming instructions.

5. Q. How much of each county's program allocation may be allocated for the required contract monitoring and reporting responsibilities?
- A. Counties will be receiving allocations for planning and service activities. The CDSS will not specify how much of the county's services allocation will need to be spent on contract monitoring/reporting activities. It is the county's responsibility to determine the appropriate monitoring/reporting activities and allocate funds for these activities.
6. Q. In counties that currently receive advances for the State Family Preservation (FP) Program, do these funds match only that county's allocation of Title IV-B funds or are they used by the CDSS to match the total State allocation of Title IV-B funds?
- A. In the federally approved FPSP state application, the CDSS stated that the match requirement for the services funds would be met by utilizing the existing State FP Program expenditures. Counties will have no matching fund requirements.
7. Q. Do counties with State FP Programs have to change their methods of accounting or fiscal reporting when they receive both State FP and Title IV-B funds?
- A. No. The State FP Program and federal FPSP are two separate programs. Counties will not change their method of accounting or reporting for the State FP Program. Counties are reminded that the CDSS intends to use the existing State FP expenditure to meet the FPSP match requirements.
8. Q. Will the State cover the match requirement for services funds for FFY 1994? For subsequent years?
- A. In a letter dated October 3, 1994, the CDSS informed counties that the current State FP funds are being applied on a statewide basis to meet the FPSP match requirements. The CDSS is committed to meeting the required FPSP match in future years through the use of the State FP funds and other appropriate state general fund resources, such as the funds expended for the Juvenile Crime Prevention Program, to the extent that these funds are available.

9. Q. Is there a limit on the amount the county can contract?
- A. No. The CDSS is not placing any limitations or restrictions on the amount of funds a county uses to contract out for FPSP activities. A county is in the best position to determine which activities should be contracted out to other agencies or private entities and how much should be spent on these activities.
10. Q. Can a county claim FPSP funds retroactively for activities that occurred before CDSS approved the county plan?
- A. Yes. Counties can claim costs associated with planning activities incurred as of July 1, 1994. These costs must be sufficiently documented to ensure a complete audit trail. The county may claim the costs when incurred. However, costs will not be reimbursed until the county plan is approved.
11. Q. Can a Child Welfare Services (CWS) supervisor claim activities in support of the FPSP?
- A. Yes. Please refer to CFL No. 94/95-04, CFL No. 94/95-21, and the Social Services Function Program Code Descriptions for September 1994 for specific time study instructions. Time spent on supervision is allocated to the FPSP activities at the end of the time study period based on the allocable time of their staff. However, a CWS first-line supervisor would time study any direct time spent on casework activities for FPSP on a daily basis.
12. Q. How do counties claim for services provided by a subcontractor?
- A. The following program identifier numbers (PINs) have been established to capture the costs for contracted services:
- o 514055 - Planning, Contract Administration
 - o 515031 - Family Preservation Services, Contracted Services
 - o 516031 - Family Support Services, Contracted Services
13. Q. What is the position of the CDSS on releasing 100% of counties' FFY 1994 planning and services dollars subsequent to plan approval? For example, will the entire FFY 1994 allocation be available upon plan approval, even if the county has not yet determined the specific services it will fund with the service portion of the allocation?
- A. Release of each county's FFY 1994 allocation is contingent upon plan approval. Once a county has received an approved plan, their entire allocation is available for expenditure. There is one allocation for both planning and services activities. Funds must be claimed according to the instructions in CFL No. 94/95-04 and No. 94/95-21. The planning and services allocations were shown separately in the FPSP Local Planning Guidelines for display purposes only.

14. Q. To avoid any county share of costs in FPSP planning activities, can counties direct charge overhead costs?

A. As you know, the current County Welfare Department (CWD) Cost Allocation Plan (CAP) was developed by a joint CDSS/County Welfare Directors' Association (CWDA) Fiscal Committee Cost Allocation Plan Task Force and applies to all programs and not just the FPSP. At that time, the Task Force agreed that costs should not be direct charged as it would impact other programs. Overhead costs are normally claimed as allocable support costs. In order to direct charge any allocable costs, such as space and equipment, a revision to the CAP would be necessary. Any change in the CAP would require careful consideration as to the effects on other programs and consultation with the Department of Health and Human Services Region IX office.

CDSS is willing to revisit a CWD CAP revision to allow more direct charging of costs, if there is a consensus of all counties via the CWDA to pursue this change.

TIMELINES

1. Q. Is there a deadline for submitting the one-year plan? The five-year plan?

A. Yes. As specified in the CDSS's letter dated October 3, 1994, the one-year plan is due on December 1, 1994 and the five-year plan is due no later than April 14, 1995.

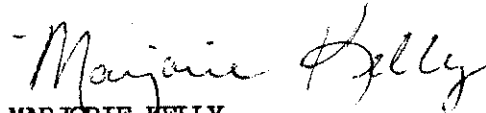
2. Q. What is the deadline for expenditure of FFY 1994 funds?

A. As provided in the existing federal regulations, FFY 1994 funds must be expended (i.e., obligated and liquidated) by September 30, 1995. There are proposed federal regulations which may change the timelines for this claiming process.

A second letter will be prepared to transmit questions and answers that were received during the recent FPSP workshops.

If you have further questions or would like clarification of the any of the issues in this letter, please contact your FPSP county consultant in the Family Preservation Bureau at (916) 445-2871.

Sincerely,

A handwritten signature in cursive script that reads "Marjorie Kelly".

MARJORIE KELLY
Deputy Director
Children and Family Services

c: County Welfare Directors Association